

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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February 27, 2020

By *ECF*

Honorable Alison J. Nathan
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: MAR 02 2020
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Re: *United States v. Virginia Lallave*, 19 CR. 15 (AJN)

Dear Judge Nathan:

I write to respectfully request that the Court order the United States Pretrial Services Office in the Southern District of New York to release Ms. Virginia Lallave's passport to her sister—Victoria Munguia—or to a representative from my office. Ms. Lallave's passport was surrendered to Pretrial Services during the pendency of her criminal case. On November 4, 2019, Ms. Lallave received a sentence of 42 months' imprisonment, to be followed by three years of supervised release. Ms. Lallave surrendered as required on December 27, 2019. Pretrial Services has informed my office that they can only release Ms. Lallave's passport pursuant to a Court order. We thus respectfully request that the Court order the release of her passport.

Respectfully submitted,

/s/ _____
Martin S. Cohen
Assistant Federal Defender
(212) 417-8737

SO ORDERED:

3/2/20


HONORABLE ALISON J. NATHAN
United States District Judge

SO ORDERED